

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Jacqueline Marcus

*Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (SCC)
Debtors.	: (Jointly Administered)
	:
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**THIRTY-FIRST NOTICE OF WITHDRAWAL OF DEBTORS’
APPLICATION TO ASSUME CERTAIN EXECUTORY CONTRACTS**

PLEASE TAKE NOTICE of the following:

1. On October 25, 2011, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed a Plan Supplement (as amended from time to time the “Plan Supplement”) [ECF No. 21254],¹ containing documents and schedules in connection with the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”),² dated December 5, 2011 [ECF No. 22973]. The Plan was confirmed by order of the Court on December 6, 2011 (the “Confirmation Order”) [ECF No. 23023] and became effective on March 6, 2012.

¹ A list of the amendments to the Plan Supplement and other notices and orders pertaining thereto is annexed hereto as Exhibit A.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Plan.

2. Pursuant to the Confirmation Order, the hearing on the Debtors' proposed assumption of certain executory contracts and unexpired leases set forth on Exhibit 2 to the Plan Supplement was adjourned until (i) February 14, 2012, or (ii) such other date as may be scheduled by the Debtors, with leave from the Court, with at least 30 days' notice to the relevant counterparty, or as otherwise agreed.

3. On January 31, 2012, February 9 and 13, 2012, April 3, 2012, May 31, 2012, June 25, 2012, August 14, 2012, October 19, 2012, November 16, 2012, December 4, 2012, February 8, 2013, March 8, 2013, June 27, 2013, October 28, 2013, February 24, 2014, June 17, 2014, July 17, 2014, October 13, 2014, January 29, 2015, March 2, 2015, June 3, 2015, July 23, 2015, September 30, 2015, February 4, 2016, March 7, 2016, October 11, 2016, February 6, 2017, December 6, 2017, December 3, 2018, and May 28, 2020, the Debtors filed notices of withdrawal of their application to assume certain executory contracts or to defer indefinitely the hearing on their application to assume certain executory contracts.

4. The Debtors hereby withdraw their application to assume the executory contracts identified on Exhibit B hereto (the "Withdrawn Contracts"). The Withdrawn Contracts represent all remaining contracts the assumption of which had been subject to objection; accordingly, all objections to assumption of executory contracts have now been resolved, adjourned without date, or have effectively become moot.

5. The Debtors reserve their rights to withdraw in the future their application to assume additional executory contracts and unexpired leases set forth on

Schedule 1 or 2 to the Confirmation Order or that are the subject of the objections listed on Schedule 1 or 2 to the Confirmation Order, to the extent such objections have not been resolved by this notice of withdrawal or any of the prior notices of withdrawal listed in paragraph 3 hereto.

Dated: December 4, 2020
New York, New York

/s/ Jacqueline Marcus
Jacqueline Marcus

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New York, New York 10153
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EXHIBIT A

**AMENDMENTS TO THE PLAN SUPPLEMENT AND OTHER NOTICES AND
ORDERS PERTAINING THERETO**

1. Amendment No. 1 to the Plan Supplement, filed on November 4, 2011 [ECF No. 21665].
2. Amendment No. 2 to the Plan Supplement, filed on November 15, 2011 [ECF No. 22156].
3. Amendment No. 3 to the Plan Supplement, filed on November 22, 2011 [ECF No. 22590].
4. Amendment No. 4 to the Plan Supplement, filed on November 29, 2011 [ECF No. 22742].
5. Amendment No. 5 to the Plan Supplement, filed on December 2, 2011 [ECF No. 22876].
6. Amendments No. 6 and No. 7 to the Plan Supplement, filed on December 5, 2011 [ECF Nos. 22975 and 22980].
7. Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on January 31, 2012 [ECF No. 24823].
8. Notice of (i) Withdrawal of Debtors' Application to Assume Certain Executory Contracts, (ii) Indefinite Adjournment of Debtors' Application to Assume Certain Executory Contracts, (iii) Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, and (iv) Status Conference on Debtors' Proposed Assumption of Executory Contracts, filed on February 9, 2012 [ECF No. 25201].
9. Third Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 13, 2012 [ECF No. 25266].
10. Order Authorizing Debtors to Assume Certain Executory Contracts and Unexpired Leases, entered by the Court on March 19, 2012 [ECF No. 27016].
11. Fourth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on April 3, 2012 [ECF No. 27262].
12. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on April 4, 2012 [ECF No. 27272].
13. Fifth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on May 31, 2012 [ECF No. 28313].
14. Notice of Presentment of Order Authorizing Debtors to Assume Certain Executory Contracts and Unexpired Leases, filed on May 31, 2012 [ECF No. 28326].
15. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 19, 2012 [ECF No. 28871].
16. Sixth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on June 25, 2012 [ECF No. 28956].

17. Corrected Sixth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on June 25, 2012 [ECF No. 28957].
18. Seventh Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on August 14, 2012 [ECF No. 30026].
19. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on September 12, 2012 [ECF No. 30894].
20. Order Authorizing Debtors to Assume Certain Executory Contract, entered by the Court on September 28, 2012 [ECF No. 31130].
21. Eighth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 19, 2012 [ECF No. 31569].
22. Ninth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on November 16, 2012 [ECF No. 32144].
23. Order Authorizing Debtors to Assume Certain Executory Contracts, entered by the Court on November 28, 2012 [ECF No. 32382].
24. Tenth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on December 4, 2012 [ECF No. 32574].
25. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on December 4, 2012 [ECF No. 32576].
26. Eleventh Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 8, 2013 [ECF No. 34503].
27. Twelfth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on March 8, 2013 [ECF No. 35786].
28. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on March 14, 2013 [ECF No. 35924].
29. Order Authorizing Debtors to Assume Certain Executory Contracts, entered by the Court on March 19, 2013 [ECF No. 36058].
30. Thirteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on June 27, 2013 [ECF No. 38227].
31. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on July 3, 2013 [ECF No. 38404].

32. Notice of Corrected Exhibit with Respect to Thirteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on July 12, 2013 [ECF No. 38686].
33. Notice of Corrected Exhibit with Respect to Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on July 15, 2013 [ECF No. 38714].
34. Order Authorizing Debtors to Assume Certain Executory Contracts and Unexpired Leases, entered by the Court on August 28, 2013 [ECF No. 39883].
35. Fourteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 28, 2013 [ECF No. 40762].
36. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on October 28, 2013 [ECF No. 40767].
37. Fifteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 24, 2014 [ECF No. 43288].
38. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on March 5, 2014 [ECF No. 43430].
39. Sixteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on June 17, 2014 [ECF No. 44752].
40. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 17, 2014 [ECF No. 44753].
41. Seventeenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on July 17, 2014 [ECF No. 45202].
42. Eighteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 13, 2014 [ECF No. 46494].
43. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on October 13, 2014 [ECF No. 46495].
44. Nineteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on January 29, 2015 [ECF No. 47999].
45. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on January 29, 2015 [ECF No. 48000].
46. Twentieth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on March 2, 2015 [ECF No. 48680].
47. Twenty-First Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on June 3, 2015 [ECF No. 49904].

48. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 5, 2015 [ECF No. 49915].
49. Twenty-Second Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on July 23, 2015 [ECF No. 50413].
50. Twenty-Third Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on September 30, 2015 [ECF No. 51013].
51. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on September 30, 2015 [ECF No. 51014].
52. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on November 23, 2015 [ECF No. 51530].
53. Twenty-Fourth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 4, 2016 [ECF No. 51959].
54. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on February 4, 2016 [ECF No. 51960].
55. Twenty-Fifth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on March 7, 2016 [ECF No. 52262].
56. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 6, 2016 [ECF No. 52979].
57. Twenty-Sixth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 11, 2016 [ECF No. 53776].
58. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on October 11, 2016 [ECF No. 53777].
59. Twenty-Seventh Notice of Withdrawal of Debtors' Application of Assume Certain Executory Contracts, filed on February 6, 2017 [ECF No. 54708].
60. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on February 6, 2017 [ECF No. 54709].
61. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 13, 2017 [ECF No. 55536].
62. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on December 5, 2017 [ECF No. 57087].

63. Twenty-Eighth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on December 6, 2017 [ECF No. 57101].
64. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 1, 2018 [ECF No. 58135].
65. Twenty-Ninth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on December 3, 2018 [ECF No. 59121].
66. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on December 3, 2018 [ECF No. 59122].
67. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 13, 2019 [ECF No. 59765].
68. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on December 3, 2019 [ECF No. 60258].
69. Thirtieth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on May 28, 2020 [ECF No. 60650].
70. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on May 28, 2020 [ECF No. 60651].

EXHIBIT B

WITHDRAWN CONTRACTS

Contract Counterparty	Debtor	Notice Address
MAGNETAR CAPITAL, LLC	LEHMAN BROTHERS HOLDINGS INC.; LEHMAN BROTHERS SPECIAL FINANCING INC.	SIDLEY AUSTIN LLP 787 SEVENTH AVENUE NEW YORK, NY 10019 TEL: (212) 839-5300 FAX: (212) 839-5599 ATTN: ALEX R. ROVIRA
UNICREDIT BANK AG, LONDON BRANCH; BNY MELLON CORPORATE TRUSTEE SERVICES LIMITED	LEHMAN BROTHERS HOLDINGS INC.; LEHMAN BROTHERS SPECIAL FINANCING INC.	SIDLEY AUSTIN LLP 787 SEVENTH AVENUE 10019 NEW YORK, NY 10019 TEL: (212) 839-5300 FAX: (212) 839-5599 ATTN: ALEX R. ROVIRA SIDLEY AUSTIN LLP ONE SOUTH DEARBORN CHICAGO, IL 60603 TEL: (312) 853-7515 FAX: (312) 853-7036 ATTN: BRYAN KRAKAUER REED SMITH LLP 599 LEXINGTON AVENUE NEW YORK, NY 10022 TEL: (212) 521-5400 FAX: (212) 521-5450 ATTN: ERIC A. SCHAFFER MICHAEL J. VENDITTO
UNICREDIT BANK AG, LONDON BRANCH BNY MELLON	LEHMAN BROTHERS HOLDINGS INC.; LEHMAN BROTHERS SPECIAL FINANCING INC.	SIDLEY AUSTIN LLP 787 SEVENTH AVENUE 10019 NEW YORK, NY 10019 TEL: (212) 839-5300 FAX: (212) 839-5599 ATTN: ALEX R. ROVIRA SIDLEY AUSTIN LLP ONE SOUTH DEARBORN CHICAGO, IL 60603 TEL: (312) 853-7515 FAX: (312) 853-7036 ATTN: BRYAN KRAKAUER REED SMITH LLP 599 LEXINGTON AVENUE NEW YORK, NY 10022 TEL: (212) 521-5400 FAX: (212) 521-5450 ATTN: ERIC A. SCHAFFER MICHAEL J. VENDITTO
BALLYROCK ABS CDO 2007-1 LIMITED	LEHMAN BROTHERS HOLDINGS INC.; LEHMAN BROTHERS SPECIAL FINANCING INC.	ORRICK, HERRINGTON & SUTCLIFFE LLP 51 WEST 52ND STREET NEW YORK, NY 10019 TEL: (212) 506-6142 FAX: (212) 506-5151 ATTN: STEVEN J. FINK THOMAS C. MITCHELL

Contract Counterparty	Debtor	Notice Address
BLACKROCK, INC.	LEHMAN BROTHERS HOLDINGS INC.; LEHMAN BROTHERS SPECIAL FINANCING INC.	SIDLEY AUSTIN LLP 787 SEVENTH AVENUE 10019 NEW YORK, NY 10019 TEL: (212) 839-5300 FAX: (212) 839-5599 ATTN: ALEX R. ROVIRA NICHOLAS P. CROWELL
DELPHI FINANCIAL GROUP, INC.	LEHMAN BROTHERS HOLDINGS INC.; LEHMAN BROTHERS SPECIAL FINANCING INC.	SIDLEY AUSTIN LLP 787 SEVENTH AVENUE 10019 NEW YORK, NY 10019 TEL: (212) 839-5300 FAX: (212) 839-5599 ATTN: ALEX R. ROVIRA MICHAEL G. BURKE
MARIETTA CROSSING PARTNERS, LLC HOLCOMB BRIDGE PARTNERS, LLC SERRANO PARTNERS, LLC	LEHMAN BROTHERS HOLDINGS INC.	HERRICK, FEINSTEIN LLP 2 PARK AVENUE NEW YORK, NY 10016 TEL: (212) 592-1400 FAX: (212) 592-1500 ATTN: ANDREW C. GOLD HAHN V. HUYNH